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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RONALD OSTROM,

Defendant.

Case No. 22-CR-60-F

**DEFENDANT'S UNOPPOSED MOTION TO ALLOW
TRIAL WITNESSES TO APPEAR AND TESTIFY BY VIDEO**

Defendant Ronald Ostrom, by and through his undersigned attorney, hereby moves this Court for its Order allowing two potential fact witnesses for the Defendant – Lester Pinkerton and Zach Blain – to appear and testify by video at the trial in this matter. In support, the Defendant states as follows:

1. At present, the Defendant is unsure whether he will call any witnesses on his behalf. If the need arises, however, Defendant may call Mr. Pinkerton and Mr. Blain to provide purely fact (i.e., non-expert) testimony.

2. Mr. Pinkerton resides in Bonners Ferry, Idaho, a distance of over 1,000 miles away from Cheyenne, Wyoming, making travel extremely costly.

3. Mr. Blain resides in Lovell, Wyoming. While Lovell is much closer to Cheyenne than Bonners Ferry, Mr. Blain owns and operates his own fuel, oil, and service center business in Lovell. His business is currently extremely short-staffed, making it very difficult for him to be away from the business for any extended amount of time.

4. In addition to the costs, there are also significant logistical problems associated with scheduling Mr. Pinkerton and Mr. Blain to appear in person at trial. As stated, the Defendant does not know if he will even need to actually call these witnesses at trial, and he likely will not know until the Government concludes its case in chief. It is difficult to know when the Government will conclude its case; it may be late in the week of December 4th, or it may not be until the next week. As such, at present, Counsel for the Defendant cannot tell these witnesses if they need to be at the courthouse, or when they should be there.

5. For all these reasons, the Defendant respectfully requests that the Court permits Mr. Pinkerton and Mr. Blain to appear and testify at trial by video, rather than in-person.

6. Counsel for the Defendant has conferred with Counsel for the United States regarding this Motion, and the United States does not oppose it.

WHEREFORE, the Defendant respectfully requests that the Court enter its Order allowing Lester Pinkerton and Zach Blain to appear and testify by video at the trial in this matter.

DATED this 28th day of November, 2023.

**RONALD OSTROM,
DEFENDANT**

By: /s/ Ryan P. Healy
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Certificate of Service

I hereby certify that on this 28th day of November, 2023, a true and correct copy of the foregoing document was electronically filed and consequently served upon Michael J. Elmore, Assistant United States Attorney.

/s/ Ryan P. Healy
Ryan P. Healy